

UNITED STATES DISTRICT COURT

for the

District of Minnesota

UNITED STATES OF AMERICA)

v.)

JOHN DOE, a/k/a JERED JOSEPH SANCHEZ)

Case No. 14-MJ-754 (HB)

CRIMINAL COMPLAINT

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about July 25, 2014, in Renville County, in the State and District of Minnesota, defendant

in a matter within the jurisdiction of the United States Social Security Administration, for the purpose of obtaining something of value and for other purposes, knowingly, and with the intent to deceive, falsely represented in a Minnesota Department of Vehicle Services Identification Card Application his Social Security account number to be xxx-xx-8894, when in fact, as defendant well knew, Social Security account number xxx-xx-8894 was not assigned to defendant,

in violation of Title 42, United States Code, Section 408(a)(7).

I further state that I am a Special Agent and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

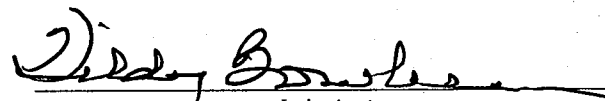
Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No


Complainant's signature

Steven Sullivan, Border Patrol Agent
Printed name and title

Sworn to before me and signed in my presence.

Date: 9/11/2014


Judge's signature

City and state: St. Paul, MN

The Honorable Hildy Bowbeer,
U.S. Magistrate Judge
Printed name and title

SCANNED

SEP 12 2014

U.S. DISTRICT COURT ST. PAUL

14-MJ-754(HB)

STATE OF MINNESOTA)

) SS: AFFIDAVIT OF STEVEN A. SULLIVAN

COUNTY OF RAMSEY)

I, Steven A. Sullivan, being of lawful age and duly sworn, depose and state:

1. I am a United States Border Patrol Agent with the United States Border Patrol (USBP), Minneapolis, Minnesota, with approximately sixteen years of combined experience as a Border Patrol Agent and as a permanent task force officer with Homeland Security Investigations (HSI), St. Paul, MN.

2. I graduated from the United States Border Patrol Academy at the Federal Law Enforcement Training Center (FLETC) in Glynco, Georgia. I hold a bachelor's degree in Political Science from Texas A&M University, College Station, Texas. I am a permanent member of the Department of Homeland Security (DHS) Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI), Document and Benefit Fraud Task Force (DBFTF). In that capacity, I have attended and completed the ICE Immigration and Benefit Fraud Training Program. I have previously investigated persons for violations of 8 U.S.C. § 1324 and 1324a (Unlawful Employment/Alien Smuggling /Illegal Harboring), 8 U.S.C. § 1325 (Marriage Fraud/Illegal Entry), 18 U.S.C. § 1546 (Visa Fraud), 18 U.S.C. § 1028 (Identity Theft), and other federal violations.

3. The following information has been related to me by HSI agents and other persons, is based on training, experience, and review of official reports, or is known to me by personal observations. Because this affidavit is being submitted solely for the

purpose of establishing probable cause, it does not contain all the facts and circumstances pertaining to this investigation.

4. This affidavit is submitted for the limited purpose of establishing probable cause in support of the attached criminal complaint against and arrest warrant for John DOE 2, a/k/a Jered Joseph Sanchez., for violation of 42 U.S.C. § 408(a)(7)(B) (Social Security Fraud) and therefore contains only a summary of the relevant facts.

5. I know that it is a violation of 42 U.S.C. § 408(a)(7)(B) for any person, with intent to deceive, and for any purpose, to falsely represent a number to be the social security account number assigned by the Commissioner of Social Security to him, when in fact such number is not the social security account number assigned by the Commissioner of Social Security to him.

6. I have identified Jered Joseph Sanchez as a victim of identity theft whose social security number has been used in Minnesota by John DOE 2 an unknown Hispanic male. John DOE 2 used the identity of Jered Joseph Sanchez to work at Triple J Family Farms (TJFF) located in Buffalo Lake, MN.

7. Since March 2014, HSI has been investigating TJFF, based on information received via the DHS-2-ICE tip line that alleged that TJFF employs 90-100 illegal aliens at its Buffalo Lake, MN plant.

8. As part of the investigation, HSI obtained records from Automatic Data Process Inc. (ADP), which provides payroll services to TJFF. These records show that as

of July 7, 2014, Jered Joseph Sanchez was listed as an employee at TJFF, with the Social Security number ***-**-8894.

9. As part of the investigation HSI also obtained TJFF Form I-9 Employment Eligibility Verification paperwork. The Form I-9 is a record that employers are required to have on file for every employee, substantiating that the employee is legally allowed to work in the United States. TJFF Form I-9 records show a Jered Joseph Sanchez, born **-**-1993, Social Security Number ***-**-8894, as an employee of TJFF, and included a copy of a Social Security card bearing the name Jered Joseph Sanchez, number ***-**-8894 and Missouri identification card bearing the name Jered Joseph Sanchez, date of birth **-**-1993. This form was signed on 03-21-2013. Another Form I-9 was also procured from TJFF bearing the name Jered Joseph Sanchez, born **-**-1993, Social Security Number ***-**-8894, and included a copy of a Minnesota identification card bearing the name Jered Joseph Sanchez, date of birth **-**-1993 and a copy of Social Security card with number ***-**-8894. This form was signed on 04-18-2014.

10. As part of the investigation HSI obtained records from Minnesota Employment and Economic Development (MNDEED). According to MNDEEDs records, Jered Joseph Sanchez was a current employee of TJFF as of the most recent quarterly reporting cycle (2nd quarter 2014).

11. On January 31, 2014, John DOE 2, using the name Jered Joseph Sanchez, applied for and subsequently received a Minnesota state identification card. Handwritten on the DVS application is the name Jered Joseph Sanchez, date of birth of **-**-1993, and Social Security number ***-**-8894. As documentation for this DVS application,

John Doe 2 provided copies of Social Security card bearing the name Jered Joseph Sanchez and the number ***-**-8894, and New Mexico birth certificate bearing the name Jered Joseph Sanchez and a date of birth of **-*-1993. This application was signed with the name Jered Joseph Sanchez.


12. Upon receiving this information I began investigating the name Jered Joseph Sanchez and the personal identifying information cited above. I learned that the Social Security Administration Office of the Inspector General determined that Social Security Number, ***-**-8894 was issued to Jered Joseph Sanchez. This is the same Social Security Number used by John Doe 2, as described above.

13. HSI's interview of New Mexico resident Jered Joseph Sanchez confirmed the following information:

- a) Jered Joseph Sanchez was born in New Mexico on ** **, 1993.
- b) Jered Joseph Sanchez has been assigned ***-**-8894 by the Social Security Administration.
- c) Jered Joseph Sanchez has never lived in the state of Minnesota and never applied for a Minnesota state document of identity.
- d) Jered Joseph Sanchez has never worked for Triple J Family Farms (TJFF), never filled-out a Form I-9 Employment Eligibility Verification for TJFF, and never worked in the state of Minnesota.
- e) Jered Joseph Sanchez stated that a previous girlfriend had possession of a copy of his birth certificate.

14. Based upon the facts stated in this affidavit, I believe that there is probable cause that the defendant, with intent to deceive and for the purposes of obtaining a Minnesota state identification card and obtaining employment under a false identity, falsely represented a number to be the social security account number assigned by the Commissioner of Social Security to his, when in fact such number is not the social security account number assigned by the Commissioner of Social Security to his, all in violation of Title 42 United States Code 408 (Social Security Fraud).

All statements contained in this affidavit are true and correct to the best of my knowledge.



Steven A. Sullivan
Border Patrol Agent
Task Force Officer
Homeland Security Investigations

Sworn and subscribed before me this 11th day of September, 2014.



The Honorable Hildy Bowbeer
United States Magistrate Judge